

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 4:18-CR-11
	:	
SHANICQUA LATRICE COLEMAN	:	

SENTENCING MEMORANDUM OF SHANICQUA COLEMAN

COMES NOW Shaniqua Latrice Coleman, by counsel, having considered the sentencing factors set forth in 18 U.S.C. §3553(a), and urges the Court that she be sentenced as agreed by her and the United States, to a term of probation of one year. This would be a sentence below the 70-87 month sentencing guideline range that would apply under the Sentencing Guidelines and is at the bottom of the Fed. R. Crim. P. 11(c)(1)(C) range of 0-36 months in the Plea Agreement. In support of her recommendation, Shaniqua Latrice Coleman states as follows:

1. Shaniqua Coleman, unlike most of the defendants in this matter who have nonetheless received favorable plea agreements anyway, plead early on and spared the government the expense of preparing for her trial. Despite that up front, prompt, acceptance of responsibility she will still be convicted of a felony crime of moral turpitude, unlike Tenikqua Fuller for example, who was only convicted of misprision of a felony. Shaniqua Coleman does recognize the more serious nature of her initial charges.

2. Ms. Coleman comes from a tight knit Danville family that includes the close involvement of her parents and sister. Indeed, they worked with her in the decision to take responsibility early on in this case. She also cares for a beautiful young child on a daily basis.

3. Ms. Coleman has no criminal history, had been employed, and was a law abiding citizen before this matter. During a long period of pretrial supervision which included electronic monitoring, she had no negative issues.

4. Balancing all these factors, Ms. Coleman respectfully submits that a sentence of one year of probation would be most appropriate.

WHEREFORE, taking into account the factors set forth in §3553(a), Shaniqua Coleman respectfully requests that she be sentenced to a term of probation of one year. This is a sentence at the low end of the agreed range, and would provide just punishment for her actions, well serving the purposes set forth in 18 U.S.C. §3553(a).

Respectfully submitted,

Dated: January 23, 2020

/s/ Richard L. Derrico

Richard L. Derrico

COPENHAVER, ELLETT & DERRICO

Attorney for Shaniqua Coleman

CERTIFICATE

I hereby certify that I have this 23rd day of January 2020, caused to be filed the foregoing Sentencing Memorandum with the Clerk of Court via CM/ECF, which will provide a copy to counsel of record.

/s/ Richard L. Derrico

Richard L. Derrico

COPENHAVER, ELLETT & DERRICO

Attorney for Shaniqua Coleman